

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HABIBOLLAH KERMANSHAH, :
Plaintiff, :
v. :
ABBAS KERMANSHAH, ABDOLMAJID :
KERMANSHAH, a/k/a MAJID :
KERMANSHAH, ABDOLHAMID :
KERMANSHAH, a/k/a HAMID :
KERMANSHAH, 263 WEST 30TH INC., :
BANAFSH REALTY, INC., EBRAHIM :
REALTY, INC., KERMANSHAH :
BROTHERS ORIENTAL RUGS, INC., :
KERMANSHAH ORIENTAL RUGS, INC., :
KERMANSHAH BROTHERS RUGS, INC., :
OVERSEAS PARTNERSHIP CO., INC., :
OVERSEAS PARTNERSHIP COMPANY, :
RAHMAN NY, INC., SHERIN WEST 86TH :
STREET CORP., SHIREWIL, INC., and :
WILSHIRE LIMITED, :
Defendants. :
-----x

Civil Action No. 1:08-cv-00409-BSJ-AJP
ECF Case

AFFIDAVIT OF
ABDOLHAMID KERMANSHAH

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

ABDOLHAMID KERMANSHAH, being duly sworn, deposes and says:

1. I submit this Affidavit in support of Defendants Abdolmajid Kermanshah, Abdolhamid Kermanshah, 263 West 30th Inc., Banafsh Realty, Inc., Ebrahim Realty, Inc., Kermanshah Brothers Oriental Rugs, Inc., Kermanshah Oriental Rugs, Inc., Kermanshah Brothers Rugs, Inc., Overseas Partnership Co., Inc., Overseas Partnership Company, Rahman NY, Inc., Sherin West 86th Street Corp., Shirewil, Inc., and Wilshire

Limited and Abbas Kermanshah Motion to Dismiss the First Amended Complaint in the above captioned action.

2. I am one of the named individual defendants.

3. I am also the brother of plaintiff Habibollah ("Habib") Kermanshah.

4. This Affidavit is based upon personal knowledge except as to matters stated to be on information and belief, and as to those matters I believe them to be true.

5. I have read the First Amended Complaint with Jury Demand dated April 18, 2008 ("Amended Complaint") in the above referenced action.

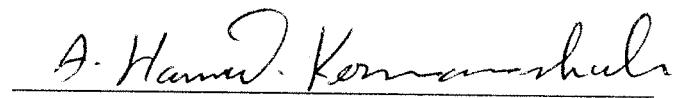
6. I am submitting this Affidavit for the purpose of providing the Court with documents that either are integral to the Amended Complaint or are referenced by Plaintiff in the Amended Complaint.

7. Annexed hereto as Exhibit A is a true and correct copy of the letter dated October 18, 2000 that my brother Majid and I, along with our parents, signed and sent to His Royal Highness Prince Abdullah Faisal Alsaud of Saudi Arabia.

8. Annexed hereto as Exhibit B is a true and correct copy of the original Arabic language document that is the counterclaim of Habibollah Kermanshah against Abbas Kermanshah in Case No. Q/1/1181 in the 6th Commercial District Board, Kingdom of Saudi Arabia, Court of Riyadh, dated December 27, 2005, as well as the notarized English translation of that document.

9. Annexed hereto as Exhibit C is a true and correct copy of the Affidavit of Abbas Kermanshah sworn to February 12, 2006 and a true and correct copy of the Affidavit of Abdolhamid Kermanshah sworn to Dec. 28, 2005 (the "Affidavits"). The

Affidavits were prepared in connection with litigation referenced in paragraph 8 above. Upon information and belief the Affidavits were given to Habib Kermanshah's attorneys in Saudi Arabia shortly after they were executed.


A. Hamid Kermanshah
ABDOLHAMID KERMANSHAH

Sworn to before me this
14th day of May 2008


Notary Public

DAVID W. PERKINS
Notary Public, State of New York
No. 01PE4918175
Qualified in Queens County
Commission Expires Feb. 10, 2010

Exhibit A



His Royal Highness Prince Abdullah Faisal Alsaud.
Riyadh, Royal Kingdom Of Saudi Arabia.

October 18th, 2000

Assalam Alekum,

Dear His Highness,

This letter is written on behalf of Kermanshah Oriental Rugs Inc., to respectfully draw your attention to the matter of past due balance of 8,473,000.00 Saudi Riyals for Persian rugs which were sold to your Highness by Mr. Abbas Hossein Kermanshah.

Mr. Abbas Hossein Kermanshah is the sole representative of Kermanshah Oriental Rugs Inc. in the Royal Kingdom of Saudi Arabia and Overseas. Mr. Abbas Hossein Kermanshah is the only authorized representative to collect payment from customers and clients.

Mr. Habibollah Kermanshah is our brother but he is not our business partner nor he involves in our business and any business transactions in the Royal Kingdom of Saudi Arabia and overseas including the United States of America. Mr. Habibollah Kermanshah is not authorized to represent and/or collect any payment for any sold rugs belonging to Kermanshah Oriental Rugs Inc. and Mr. Abbas Hossein Kermanshah.

Mr. Abbas Hossein Kermanshah sold Persian rugs to your highness many years ago in good faith and to date Mr. Abbas Hossein Kermanshah does not receive any payment yet and as a result Kermanshah Oriental Rugs Inc. has been going through severe financial crisis because Kermanshah Oriental Rugs Inc., got the loan and purchased these Persian rugs which were sold to your highness and the Kermanshah Oriental Rugs Inc., is still paying the interest on this loan.

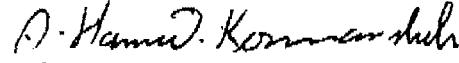
Kermanshah dearly appreciates your business and deeply accepts your kind action to make the payment of balance due in full immediately to Mr. Abbas Kermanshah. Mr. Abbas Kermanshah is our only representative in the Royal Kingdom of Saudi Arabia.

Witness:

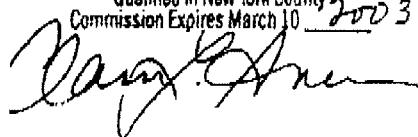

Hossein Mohammad Kermanshah
(Father)

Gilan Kermanshah
(Mother)

Sincerely Yours.


Dr. Abdolhamid Kermanshah
Brother.


Abdolmajid Kermanshah
Brother.

Sworn before me this 18th day of Oct 2003, 

CLAUDIA L. GUERRA
Notary Public, State of New York
No. 01GU5074195

Qualified in New York County

Commission Expires March 10 2003

57 FIFTH AVENUE • NEW YORK, NY 10003
(212) 627-7077 (212) 627-2939

Exhibit B

خدمات المغترب
Immigrant Services
 552 Atlantic Ave. Brooklyn, NY 11217
 Tel. 718-330-0732

(Translated from Arabic Original Document)
By the Name of Allah the Merciful the Most Merciful

Thanyan Said Bin Thanyan Office

Counselors & Attorneys at Law
 License 154/25

Date: 11/25/1426 (12/27/2005)

Dear president and members of the 6th Commercial District Board in the claim office

Peace be upon you

I, Thanyan Said Bin Thanyan, agent of Habib Kermenshah submit this notice on his behalf in Case No. Q/1/1181 which is submitted from my client as a counterclaim against Abbas Kermenshah and the summery of it is as follows:

Regarding the proof of the partnership between my client and the defendant in the trade of carpets whether in the Saudi Arabia or outside of Saudi Arabia my client has proofs and evidences that prove their partnership for more than two decades, and some of them are:

1. My client is a partner with his brothers in (Kermenshah Brothers Eastern Carpets Company) which its main office is in New York, USA. He has 160 Shares paid in full out of 200 shares the capital of the company, (attached as proof No. 1)
2. My client came to Saudi Arabia to work in the trade of Carpets in Saudi after he has worked in the same business in Emirate, Kuwait and other parts of the Middle East. Since the defendant, Abbas Kermenshah, was the oldest of his brothers and he was the responsible person for the administration of the business, all of the dealings were done under his name and his signature. They worked together as partners in Saudi Arabia and outside Saudi Arabia, and they imported carpets for many of their clients such as, my client imported carpets from Iran via Kuwait according to shipment tracking No. (85116205-096) for the defendant (attached as proof No. 2) and another one according to shipment tracking No. (096-75367401) under the name of the defendant (attached as proof No. 3). The point is that sending this shipment by my client to the defendant to Saudi Arabia shows that there is dealing between them and this dealing is the partnership between them. If not why would my client sent these shipments and others to the defendant. My client sent a shipment to Prince Naif Bin Abdulaziz according to shipment tracking No. (072-29859152) (attached as proof No. 4). The proof of their partnership is the letter which

the defendant sent to Prince Naif Bin Abdulaziz informing him of the price of the carpets. This letter has the signature of the defendant. (attached as proof No. 5). My client sent a shipment to Prince Faisal Bin Fahd according to shipment tracking No. (072-15754281) (attached as proof No. 6) the defendant also sent a signed letter to Prince Faisal Bin Fahd demanding the payment of the carpets prices (attached as proof No. 7). My client sent a shipment to the defendant via Beirut international airport to the USA according to shipment tracking No. (05113905), (attached as proof No. 8). There is a price list and letters from (Kermenshah Brothers, company) which my client owns 160 shares of it, as clarified in section No. 1 (attached as proof No. 9)

3. Both my client and the defendant had deposited some carpets with Wamdhia commercial import associate as a trust, an agreement was written with the above-mentioned associate. In the agreement it was mentioned that the second party of the agreement are Abbas and Habib Kermenshah (attached as proof No. 10). The defendant has acknowledged that his brothers, Habib Allah Kermenshah, Abdulmajeed Kermenshah, and Dr. Abdulhameed Kermenshah, (Meaning the partners in Kermenshah brothers Company has the right to control and/or act with the carpets in Maradh Alnokhbah Alnadirah in his absence, (attached as proof No. 11).
4. My client and the defendant acted as representatives of Kermenshah Brothers Company (which my client owns 160 shares of it fully paid) and made an agreement with AlQusoor Alraqia Associate in Saudi Arabia according to the agreement dated 07/25/1984, the defendant signed the agreement as its agent (attached as proof No. 12) the defendant was responsible of the administration of the company. (attached as proof No. 13), (business card of the company). The lease of the branch in Jeddah was in my client's Name (copy of the lease attached as proof No. 14). The phones of the branch was under my client's Name and he used to pay the phone bills (attached a receipt for the branch in Jeddah as proof No. 15). We also sending you a copy of a receipt for paying the rent of the branch (attached as proof No. 16)
5. The defendant sent a signed letter to Prince Abdulaziz Bin Faisal demanding the payment of the carpets prices which was shipped to him and the phone numbers of the Alqusoor Alraqia was mentioned in the letter (attached as proof No. 17).
6. My client and the defendant imported carpets for Prince Abdullah Alfaaisal, a disagreement over the price took place and an agreement was written to issue two checks, one payable to my client and the other payable to the defendant. The agreement was signed by my client and the defendant. (attached as proof No. 18). This is a clear proof that there is a partnership between in the carpets business.
7. The defendant sent a signed letter (letter head of Kermenshah Brothers Company) which my client own 160 shares of it, to Shaikh Saad Bin Abdullah Bin Ammar (an agent of King Fahd Bin

Abdulaziz (may Allah have mercy on him) demanding the payment of the price of 42 Iranian carpets shipped to Alyamamah Castle in Riyadh (attached as proof No. 19).

8. My client and the defendant imported a cotton Iranian carpet to princess Nouf Bint Mohamed Bin Saud (the great) and she wrote a note acknowledging that she has received the carpet and she promised to pay the price to Abbas Kermenshah or Habib Kermenshah (attached as proof No. 20). This is a clear proof of the existence of the partnership between my client and the defendant.
9. My client and the defendant open a joint bank account in the Saudi English Bank No. (01-118942-13) (attached as proof No. 21)
10. My client sent a letter to Dubai Limited Bank in Dubai city Emirate giving power of attorney to the defendant to act on his behalf regarding the account No. (111713). This letter contains the signature of the defendant and the verification of the private bank in Riyadh (attached as proof No. 22). The question is why my client would give the defendant the right to control and act on his behalf in his account if they do not have dealings proving this matter.
11. We also enclose testimonies of more than 30 witnesses proving that there is a partnership between my client and the defendant in the carpet business. All of them are willing to come to your commercial district office and testify before your honors.

Your honors,

Everything that has been above-mentioned is consider material and clear proofs which has no doubt proving and confirming that there is a partnership in the carpet business between my client and the defendant. Therefore, we demand the appointment of a judicial guard over the branches in Riyadh and Jeddah, and counting the inventories in them considering (adding) what the defendant has removed since he became aware of this lawsuit and dissolve the partnership between them.

We also demand the issuance of order to prevent the defendant from traveling and prevent him from having control over the carpet business until after the decision of this case.

Seal and signature of the law office

Translator Note:

The A.D dates are not mentioned in the Arabic document, they are converted from H.J. date using software.

State of New York, Kings County}

I, Abdo Kayed, do solemnly swear that I am fluent in both the Arabic and English languages, I am competent to translate the attached document and that the translation is true and accurate, to the best of my abilities.

SWORN AND SIGNED
KINGS CO. NEW YORK

Subscribed and sworn to before me this 9th *day of* May, 2008

Abdo K. Kayed

Notary public

EMRAN AHMAD
Notary Public, State of New York
No. 01AH4699882
Qualified in Nassau County 3
Cert. Filed in Kings County
Commission Expires March 30, 2011

بسم الله الرحمن الرحيم

Thanyan Said Bin Thanyan
Office
COUNSELORS & ATTORNEYS AT LAW
Licence 154/25



مكتب
ثنيان سعيد بن ثنيان
حامون ومستشارون قانونيون
ترخيص ٢٥ / ١٥٤

التاريخ : ٢٥ / ١١ / ١٤٢٦هـ

أصحاب الفضيلة رئيس وأعضاء الدائرة التجارية السادسة بديوان المظالم
السلام عليكم ورحمة الله وبركاته ،،،

يتقدم لفضيلتكم بهذه المذكرة / ثنيان سعيد بن ثنيان - بالوكالة عن المدعي / حبيب كرمنشاه - في الدعوى رقم (١١٨١ / ١ / ق) المقامة من موكله في مواجهة / عباس كرمنشاه ونوجز فيما يلي : -

فيما يخص إثبات الشراكة بين موكله والمدعي عليه في تجارة السجاد سواء داخل المملكة العربية السعودية أو خارجها فتوجد لدى موكله قرائن وأدلة تثبت هذه الشراكة على امتداد أكثر من عقدين من الزمن ومنها ما يلي :

- ١- إن موكله شريك مع أخوانه في شركة كرمنشاه أخوان للسجاد الشرقي - مقرها الرئيسي في نيويورك بالولايات المتحدة الأمريكية - وله فيها عدد (١٦٠) مائة وستون سهماً مسدة بالكامل من أصل (٢٠٠) مائتان سهم هي رأس مال الشركة (مرفق كمستند رقم ١) .
- ٢- حضر موكله على المملكة العربية السعودية للعمل بتجارة السجاد بالمملكة بعدها عمل في نفس المجال في الإمارات العربية المتحدة والكويت وغيرها من دول الشرق الأوسط ، وحيث أن المدعي عليه (عباس كرمنشاه) كان هو الأخ الأكبر في الشركة وكان هو المسؤول الإداري فيها ، فكانت كل المعاملات تسرى باسمه وتحت توقيعه . فعمل سوياً في ظل هذه الشراكة سواء في المملكة أو خارجها ، وقاما بتوريد سجاد للكثير من العملاء منها على سبيل المثال :
(أ) قام موكله بتوريد طلبية سجاد من إيران عبر الكويت ، بموجب بوليصة الشحن رقم (٠٩٦ - ٨٥١١٦٢٠٥) للمدعي عليه (مرفق صورة كمستند رقم ٢) ، وكذلك طلبيه أخرى بموجب البوليصة رقم (٠٩٦ - ٧٥٣٦٧٤٠١) باسم المدعي عليه ، (مرفق صورة كمستند رقم ٣)

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COUNSELORS & ATTORNEYS AT LAW
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محامون ومستشارون قانونيون
ترخيص ٢٥/١٥٤

والشاهد هنا أنه إرسال موکلي هذه الطلبيات باسم المدعى عليه للملكة يعني وجود تعامل بينهم ، فـن لم يكن هذا التعامل هو مشاركة بينهم ، فـلماذا أرسل موکلي للمدعى هذه الطلبيات وغيرها ؟
(ب) أرسل موکلي طلبية سجاد من دبي إلى صاحب السمو الملكي الأمير / نايف بن عبد العزيز بموجب بوليصة الشحن رقم (٢٩٨٥٩١٥٢ - ٠٧٢) ، (مرفق صورة كمستند رقم ٤) والشاهد على وجود شراكة بين موکلي والمدعى عليه ، هو الخطاب الذي وجهه المدعى عليه لصاحب السمو الملكي الأمير نايف بن عبد العزيز - يوضح فيه سعر هذا السجاد ، وهذا الخطاب يحمل توقيع المدعى عليه ، (مرفق صورة كمستند رقم ٥) .

(ج) أرسل موکلي طلبية سجاد باسم صاحب السمو الملكي الأمير / فيصل بن فهد - بموجب بوليصة الشحن رقم (١٥٧٥٤٢٨١ - ٠٧٢) ، (مرفق كمستند رقم ٦) ، ووجهه المدعى عليه كذلك خطاب ممهور بتوقيعه لصاحب السمو الملكي الأمير / فيصل بن فهد - للمطالبة بتسديد قيمة هذا السجاد ، (مرفق كمستند رقم ٧) .

(د) أرسل أيضاً موکلي طلبية سجاد للمدعى عليه عبر مطار بيروت الدولي إلى الولايات المتحدة الأمريكية بموجب بوليصة الشحن رقم (٠٥١١٣٩٠٥) ، (مرفق كمستند رقم ٨) .

(هـ) توجد قائمة أسعار ، وإرساليات برسم البيع وجهه من شركة كرمنشاه إخوان (التي يملك موکلي فيها عدد ١٦٠ سهم وفقاً لما ذكر الفقرة - ١ - أعلاه) ، وممهورة بتوقيع المدعى عليه ، (مرفق كمستند رقم ٩ - أ - ب - ج) .

٣- لقد وضع موکلي والمدعى عليه بعض السجاد كأمانة لدى مؤسسة ومضة للتجارة والتوريدات وتم تحرير محضر بذلك بينهما وبين المؤسسة المذكورة ، وقد ذكر في هذا المحضر أن الطرف الثاني هما " عباس وحبيب الله حسين كرمنشاه " ، مرفق كمستند رقم (١٠) ، وقد أقر المدعى عليه بـن اخوه وهم " حبيب الله كرمنشاه وعبد المجيد كرمنشاه والدكتور عبد الحميد كرمنشاه " - أي الشركاء في شركة كرمنشاه إخوان - لهم حق التصرف في السجاد الموجود لدى معرض النخبة النادرة في غيابه أو حضوره ، (مرفق صورة كمستند رقم ١١) .

٤- قام المدعى عليه وموکلي كممثلين لشركة كرمنشاه إخوان ومقرها نيويورك (والتي يملك فيها موکلي ١٦٠ سهم مدفوع القيمة) بالتعاقد مع مؤسسة القصور الراقية بالمملكة العربية السعودية بعقد وكالة توزيع بموجب العقد المؤرخ بينهم بتاريخ ٢٥ / ٧ / ١٩٨٤ م ، ووقع المدعى عليه

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محامون ومستشارون قانونيون
٢٥ / ١٥٤

على هذا العقد باعتباره ممثل الشركة (مرفق صورة كمستند رقم ١٢) وكان المدعى عليه يتولى الإداره ، (مرفق صورة كمستند رقم ١٣ من البزنس كارت للمؤسسة) وكان عقد الإيجار لفرع بمدينة جدة باسم موکلي ، (مرفق صورة من عقد الإيجار كمستند رقم ١٤) ، كما كانت هواتف المكتب مسجلة لدى شركة الاتصالات باسم موکلي وهو من كان يقوم بدفع هذه الفواتير (مرفق صورة من سداد فاتورة مكتب بجده كمستند رقم ١٥) ، كما نرفق لفضيلتكم صورة من إيصال سداد قسط الإيجار للمكتب ، (مرفق كمستند رقم ١٦) .

٥- وجهه المدعى عليه خطاب ممهور بتوقيع إلى سمو الأمير / عبد العزيز بن فيصل آل سعود - للمطالبة بقيمة سجاد تم توريد له لسموه ، وذكرت هواتف مؤسسة القصور الراقية (مرفق كمستند رقم ١٧) .

٦- قام موکلي والمدعى عليه بتوريد سجاد لصاحب السمو الملكي الأمير / عبد الله الفيصل - وقد حدث خلاف على سعر هذا السجاد ، فحرر محضر على مطبوعات سمو الأمير ، بأن يحرر شيكين بمبلغ السجاد أحدهما باسم موکلي والآخر باسم المدعى عليه ، وتم توقيع هذا المحضر من موکلي والمدعى عليه ، وشهادة شهود (مرفق صورة كمستند رقم ١٨) ، وهذا دليل واضح على وجود شراكة بينهما في تجارة السجاد .

٧- وجهه المدعى عليه خطاب ممهور بتوقيع على مطبوعات شركة كرمنشاه أخوان (التي يملك موکل يفيها ١٦٠ سهماً) للشيخ / سعد بن عبد الله بن عمار - وكيل خادم الحرمين الشريفين الملك / فهد بن عبد العزيز - يرحمه الله - للمطالبة بقيمة عدد (٤٢) سجاده إيراني قام بتوريدتها لقصر اليمامة بالرياض ، (مرفق صورة كمستند رقم ١٩) .

٨- ورد موکلي والمدعى عليه سجادة إيراني صوف واحدة للأمير / توف بنت محمد بن سعود الكبير وحررت سموها إقرار بأنها استلمت وإنها ملتزمة بسداد المبلغ إلى عباس حسين كرمنشاه أو حبيب كرمنشاه ، (مرفق صورة كمستند رقم ٢٠) ، وهذا دليل واضح على وجود الشراكة بين موکلي والمدعى عليه .

٩- فتح موکلي والمدعى عليه حساب مشترك بالبنك السعودي البريطاني رقم (١٣ - ١١٨٩٤٢ - ٠١) (مرفق صورة كمستند رقم ٢١) .

بسم الله الرحمن الرحيم

Thanyan Said Bin Thanyan
Office
COUNSELORS & ATTORNEYS AT LAW
Licence 154/25



مكتب
ثنيان سعيد بن ثنيان
محامون ومستشارون قانونيون
ترخيص ٢٥/١٥٤

١- لقد وجه موکلی خطاب إلى بنك دبي الوطني المحدود - بمدينة دبي بالإمارات العربية المتحدة لتوکیل المدعى عليه للتصرف في الحساب رقم (١١١٧١٣) الخاص بموکلی ، وهذا الخطاب عليه توقيع المدعى عليه ومصادقة البنك الأهلي بالرياض على هذا التوقيع ، (مرفق كمستند رقم ٢٢) . والسؤال الذي يطرح نفسه هنا هو لماذا يفوض موکلی المدعى عليه للتصرف في حسابه ويمنحه كل هذه الصالحيات إن لم توجد بينهم تعاملات تبرهن هذا الأمر .

١١- كما نرافق لأصحاب الفضيلة شهادة أكثر من ثلاثة شاهد بأنه توجد شراكة بين موکلی والمدعى عليه في تجارة السجاد ، والجميع بحمد الله وفضلة على استعداد للمثول أما مقام الدائرة للإدلاء بشهادتهم على وجود هذه الشراكة .

ثانياً له كل فهو حسیر انه ما عجز فهو عذر

أصحاب الفضيلة ... ثبتت حكم امير سارس لغير من محارس ٢٢٨ سجاد
ان كل ما ذكر أعلاه قرائن وأدلة مادية واضحة لا ريب يفيها ثبت وتأكد وجود شراكة في تجارة السجاد بين موکلی والمدعى عليه . عليه نلتمس من فضيلتكم تعين حارس قضائي على محلات السجاد سواء بالرياض او بجدة ، وجرد ما فيها ، وما قام المدعى عليه بنقله منها منذ علمه بوجود هذه الدعوى وإجراء المحاسبة بينهم .

ذلك نلتمس من فضيلتكم إصدار أمراً بمنع المدعى عليه من السفر ومنعه من التصرف في السجاد لحين البت في هذه الدعوى .

والله يحفظكم ويرعاكم ، ، ، ، ،

ثنيان سعيد بن ثنيان

وكيل المدعى

ثنيان سعيد



برأتني اع بسجاد
سراحتكم

ادا اردت له مرفق في خواص برسالتك

Exhibit C



Embassy of the United States of America

AFFIDAVIT

Kingdom of Saudi Arabia)
 Province of Riyadh)
 City of Riyadh) ss:
 Embassy of the United)
 States of America)

Before me, Jill A. Sykes, Consul of the United States of America at Riyadh, Saudi Arabia, duly commissioned and qualified, personally appeared Mr. Abbas Kermanshah, who being duly sworn according to law, depose(s) and say(s) as follows:

That I, have reviewed the attached stock certificate of Kermanshah Brothers Oriental rugs, Inc., number 13We, allegedly certifying that Habibollah Kermanshah is the owner of one hundred sixty shares of the corporation. And that I do not have any knowledge about this stock certificate. It is a forged document. My name "Abbas Kermanshah" is on this stock certificate in the capacity of the President of Kermanshah Brothers Oriental rugs, Inc., but my signature is not thereon this stock certificate. It is a forged document. That the signature at the left bottom of the stock certificate is not the Mr. Abdolhamid Kermanshah's signature and the name on the bottom of the stock certificate is misspelling. It is forgery and fraudulent. Please see the attached Notarized affidavit of Mr. Abdolhamid Kermanshah in which he is denying the existing of this stock certificate. That I, have attached a copy of Mr. Abdolhamid Kermanshah's US Passport showing the correct spelling of his name and has a copy of his signature. That I, have attached a copy of my US Passport #710479642 issued on September 08, 2004 from US Embassy, Riyadh, Royal Kingdom of Saudi Arabia.

Further deponent(s) saith not.

Signature of Affiant(s)

Subscribed and sworn to before me, this 12th day of Feb., 2006

Consul of the United States
of America

لِبِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

لقد تقدم السيد/ عباس كرمان شاه إلى السفارة الولايات المتحدة الأمريكية بالرياض

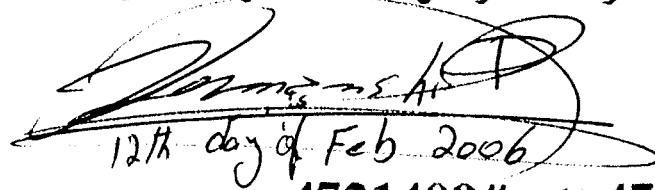
ووضح بالتالي :-

أن السيد/ عباس كرمان شاه يقيم حالياً في الرياض ، المملكة العربية السعودية .
بعد مراجعة الدقيقة للشهادة ملكية الأسهم لمؤسسة كرمان شاه للسجاد الشرقي
المرقمة " 3 " المعدة والمقدمة من قبل السيد/ حبيب الله كرمان شاه فحواها يد عمي بأنها
يملأ مائة وستون اسهم من الأسهم المؤسسة كرمان شاه للسجاد الشرقي . وأنما ما
عندى أي علم بهذا الشهادة . وأنها غير صحيحة ومزورة .

أن اسني " عباس كرمان شاه " موجود في هذه الشهادة كرئيس مؤسسة كرمان شاه
وإخوانه للسجاد الشرقي ولكن توقيعي غير موجود . وهذا يؤكد إنها مزورة .
وكذا لكت التوقيع الذي يظهر في الشهادة لسيد/ عبد الحميد كرمان شاه غير مطابق
واسمه مكتوب خطأ . انظر إلى خطاب المعتمد المرفق لسيد/ عبد الحميد كرمان شاه
الذي ينكر وجود مثل هذه الشهادة .

مرفق صورة الجواز السفر الأمريكي لسيد/ عبد الحميد كرمان شاه الذي يبين لنا كتابة
اسمه على وجه الصحيح وتوقيعه أيضاً .

وهرفق صورة من الجواز السفر الأمريكي رقم " 710479642 " الصادر في
سبتمبر 8، 2004 من السفارة الأمريكية ، الرياض ، المملكة العربية السعودية .


12th day of Feb 2006

ترجمة: خطاب الشهادة

أبو موسى / ت 4721409# فاكس# 4765559

NYS Department of State

Division of Corporations

Entity Information

Selected Entity Name: KERMANSHAH BROTHERS ORIENTAL RUGS, INC

Selected Entity Status Information

Current Entity Name: KERMANSHAH BROTHERS ORIENTAL RUGS, INC.

Initial DOS Filing Date: JULY 11, 1972

County: NEW YORK

Jurisdiction: NEW YORK

Entity Type: DOMESTIC BUSINESS CORPORATION

Current Entity Status: INACTIVE

Selected Entity Address Information

DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)

HOUBAS ORIENTAL RUGS, INC.

290 FIFTH AVE.

NEW YORK, NEW YORK, 10001

Registered Agent

NONE

NOTE: New York State does not issue organizational identification numbers.

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Division of Corporations, State Records and LICC Home Page [NYS Department of State Home Page](#)

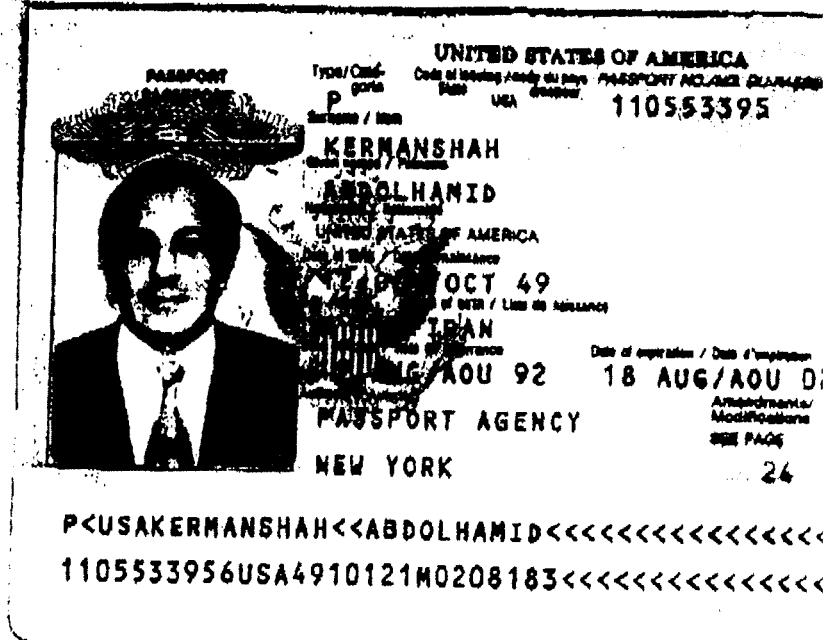
The Secretary of State
of the United States of America
hereby requests all whom it may concern to permit the citizen/
national of the United States named herein to pass
without delay or hindrance and in case of need to
give all lawful aid and protection.

Le Secrétaire d'Etat
des Etats-Unis d'Amérique
prie par les présentes toutes autorités compétentes de laisser passer
le citoyen ou ressortissant des Etats-Unis titulaire du présent passeport,
sans délai ni difficulté et, en cas de besoin, de lui accorder
toute aide et protection légitimes.

A-Hamed Kermani Shah

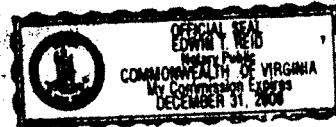
SIGNATURE OF BEARER/SIGNATURE DU TITULAIRES

NOT VALID UNTIL SIGNED



A-Hamed Kermani Shah

Commonwealth of ALEXANDRIA
Commonwealth of VA
The foregoing instrument is acknowledged before me this 28th day of DEC
2008 by
A-Hamed KERMANSHAH
(Name of Person Acknowledging Instrument)
Notary Public
My commission expires 31 DEC 2008



ABBAS KERMANSHAH

December 30th. 2005RE : AFFIDAVIT.

I, Abbas Kermanshah being duly sworn deposes and say :

- 1- That I, am currently residing at _____
Riyadh, Royal Kingdom Of Saudi Arabia.
- 2- That I, have reviewed the attached stock certificate of Kermanshah Brothers Oriental rugs, Inc., number " 3 ", allegedly certifying that Habibollah Kermanshah is the owner of one hundred sixty shares of the corporation. And that I do not have any knowledge about this stock certificate. It is a forged document.
- 3- My name "Abbas Kermanshah" is on this stock certificate in the capacity of the President of Kermanshah Brothers Oriental rugs Inc., but my signature is not there on this stock certificate. It is a forged document.
- 4- That the signature at the left bottom of the stock certificate is not the Mr. Abdolhamid Kermanshah 's signature and the name on the bottom of the stock certificate is misspelling. It is forgery and fraudulent. Please see the attached notarized affidavit of Mr. Abdolhamid Kermanshah in which he is denying the existing of this stock certificate.
5. That I, have attached a copy of Mr. Abdolhamid kermanshah 's US. Passport showing the correct spelling of his name and has a copy of his signature.
6. That I, have attached a copy of my US. Passport # 710479642 issued on September 08, 2005 from US. Embassy, Riyadh, Royal Kingdom Of Saudi Arabia.

Sworn to me before this 12 day of Feb 2006 2005

Feb 12, 2006

DR. ABDOLHAMID KERMANSHAH
217, East 83rd. Street
Apartment # 2-B
New York, N. Y. 10028
Telephone: 1-212-627-7099 (Business)
1-212-737-7798 (Home)
1-917-815-7057 (Mobile)

RE : AFFIDAVIT :

I, Abdolhamid Kermanshah, being duly sworn deposes and say:

1. That I, am currently residing at 217 East 83rd. Street, Apartment 2 B, New York, N. Y. 10028.
2. That I have never been known by any other name than ABDOLHAMID KERMANSHAH.
3. That I have reviewed the attached stock certificate of Kermanshah Brothers Oriental Rugs, Inc., number "3", allegedly certifying that Habibollah Kermanshah is the owner of one hundred sixty shares of the corporation. And that I do not have any knowledge about this stock certificate. It is a forged document.
4. That the signature at the bottom of the stock certificate is not mine and the spelling of my name on the bottom of the stock certificate is misspelled. It is forgery and fraudulent.
5. That I have attached a copy of my US. Passport showing the correct spelling of my name and has a copy of my signature.
6. That I am willing to testify in person, if needed.

A. Abd. Kermanshah
ABDOLHAMID KERMANSHAH

Sworn to before me this
28th. day of December, 2005

28 day of December, 2005
STATE OF VA, CITY OF ALEXANDRIA



